EL. VR2 MEMOR ANDUM DATE: TO: Adolfo Gonzalez , DWPC -- Region 2

Deficiency Report on LTV Steel

NPDES No. IL0002593 Inspection Date: Feb 15,1990 FROM: SUBJECT: Description of apparent NPDES violations - Non too reporting period Jan- Pet 31 2- 004 0-FAU EPA Region 5 Records Ctr. Description of O & M Deficiencies - 0.1 leak from cutter dom to River Controllance Assurance Section from Republic Engineered Street Scritica OF LTV 4PR 1 7 1990 Environmental Protection Agency Initial Action Recommendation: Should CIL be sent? No Immediately
Should CIL be held pending lab results? Can phone call resolve problems? - Republic Enginered Street has addressed above leak

- Republic Enginered Street needs to obtain MIRES pormit

Follow up action:

Comments on Discharge Action Comments on Discharger Action:

JF:mgg618b/sp/2

Action Decision:

Final Action Recommendation:

WPC 245 12/79

CC: DWPC/FOS DWPC/CAS

COMPLIANCE SAMPLING INSPECTION

LTV STEEL CO./REPUBLIC ENGINEERED STEELS (Cook County)

NPDES #IL0002593

INSPECTION DATE:

February 15, 1990

INTERVIEWED:

Michael J. Thomas, Envr. Coord.,
LTV Steel Co.
Patrick L. Monnot, SARA Coord.,
Republic Engineered Steels
Jerry Lasniewski, Crew Chief,
Republic Engineered Steels
Norm Szymanski, Lab Supervisor

Adolfo Gonzalez, Jr., EPE, Maywood

INSPECTOR:

Introduction

On the above date, a Compliance Sampling Inspection was performed at the subject facility. In addition to the 3560-3 form, a DMR Summary, Facility Flow Diagram and Site Location are included.

Facility Description

LTV Steel Co. is a fully integrated steel mill at reduced activity. Remaining operations are confined to coke-making (and by-products) plus 11" hot forming mill and wire mill pickling and finishing. On Nov. 28, 1989, a portion of LTV Steel Co. was purchased by its employees and said new firm was labelled Republic Engineered Steel. Included in the acquisition were the 11" hot forming mill, storage and conditioning wire mill, pickling and finishing, associated pump house #1 and waste water treatment facilities (outfalls 001 & 002).

NPDES Related Items

Outfall 004 was the only active discharge for the reporting period Jan.-Dec. 1989. Permit limits were not exceeded per self-monitoring reports for above period. The facility's permit - issued on December 31, 1984 - expired on January 1, 1990. Draft Permits dated October 23/December 18, 1989 addressed - among other items - acquisition and modified monitoring of remaining outfalls. Recent public noticed permit (Dec. 18, 1989) indicated that outfall 004 ("non contact cooling water, storm water, and groundwater) would be monitored for pH, temperature, ammonia-nitrogen and total phenols.

Republic Engineered Steels was to obtain an NPDES permit for outfalls 001, 002 (003 and 005 were capped-off [per facility officials] in summer of '89).

CSI - LTV Steel Co./Republic Engineered Steels Page 2

Inspection Findings

Discharge was occurring from outfall 004 during period of inspection. Sample results (from grab) were within permit limits.

The coke plant laboratory was inspected for analysis performed on site (pH, temperature). Temperature readings are based on an NBS (Fisher) reference thermometer. pH measurement was being performed via a temperature compensated Fisher Accurate meter (standardized at pH 4 and 10). Lab water is demineralized via a Barmstead Sybren Corp. unit. pH meter calibrations are logged. Dates, times and exact locations were being recorded for samples collected. On site analysis include TSS and pH, but oil and grease determinations are performed in the Indiana lab.

As had been indicated in the previous inspection report (March 16, 1989), an "oil leak from coffer dam was causing a rainbow sheen along east branch of River." This problem was addressed by Republic Engineered Steels on March 23, 1990 when a similar situation occurred. Remedial steps included pinpointing source of leak and repair of coffer dam via underwater welding.

AG:bh:4850B

	Office	Wash	ington, D. C. 20460	on Agenc	7	ł	1				
SEPA	NPDES Co		•								
Transaction Code	NPDES			,		e Inspe	rtor Fac Type				
111 25											
		_		_							
COMPLI	AINICIEL LEIVIALLIUL			PIEIC	THION	111					
2T Reserved						served	6				
67 69	•			73			80				
Name and Location	on of Facility Inspected	360	tion p. Facility Di	ıta	Entry Time 52		Permit Effective Date				
LTV STE	el Co-Chicago W	orks			9.00	M LJ PM					
	j				Exit Time/Date						
					11:30	2/15/40	1				
Name(s) of On-Site			Title(s)				Phone No(s)				
Mike Th	i va u j						\ <u>-</u>				
					oord.		(216) 438-5802				
		Steel		Chi	ef		<u> </u>				
1			I Itile En	14.	Coord.						
Mike	1 nomes		Phone No.			Contacted					
			(219)	391		Yes No					
Section C: Areas Evaluated During Inspection											
											
Permit Permit)	'			1.4	 '					
9 Records/Repo	presentative(s) mas LTV STed Envr. Coord. SARA Coord. SARA Coord. SARA Coord. SIGNO HIS B-5802 Crew Chief Title Five. Coord. Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unassilactory, N = Not Evaluated) Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unassilactory, N = Not Evaluated) Section D: Summary of Findings/Comments (Attach additional sheets if necessary) OH (only write out fall). OH (only write out fall). OH (S = Satisfactory, N = Marginal, U = Unassilactory, N = Not Evaluated) OH (only write out fall). OH (only write out fall). OH (only write out fall). OH (S = Satisfactory, N = Marginal, U = Unassilactory, N = Not Evaluated) OH (only write out fall). OH (only write out										
\- 											
											
_	004 (,		a (~ 11)		in 117		-mit limit				
_	009 Confy acti	r! 0U	teath) ,		NA V	, r					
	equitered F) r	perio d	J	un-Drc	८४.					
		,	, ;		, ы.	11100	Engineered Stor				
- JUT LALLS DOLJODZ belong to Kepshire Engineer											
	since Nov 23	3 : 93	1. said	ەك	impany he	د ت م	un WPDES				
	icom !+ in	3 an	UT 1	FALL	. J	•					
		-			' A '						
-	Or eak two	VC	io-for d	am	40 KI	122	was 13 he				
	Acadired acom		+ (4			-					
	tech areas here.	, .,	1 13								
											
		Agency/	Office/Telephone		(708)] '	Date				
Adolfo (sonzulez Jr	LEPA	t/Moyuoo	d/3	45-9780	1	Feb 15, 1940				
<u> </u>			<u>J</u>								
						ĺ					
In						1					
Signature of Review	ver	Agency/	Office				Date				
											
		Re	gulatory Office Us	e Only							
Action Taken					Date		Compliance Status				

Noncompliance Compliance

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable	TLOODZS 93				
SECTION F - Facility and Permit Background		20 1 0 2 3	7.3		
ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY (Including City, County and ZIP code)		_	TATE		
LTV Steel Corp FINDINGS 3100 F. 45th ST DMR complian		XS+			
Steel STP ST PMR compliant Cleveland, OHIO 44125 items addressed =	HOM	-hone	•		
SECTION G - Records and Reports	STAPL	Ftrm 1t			
	rther expl	anation attached	1		
DETAILS:					
(a) ADEQUATE RECORDS MAINTAINED OF:					
(i) SAMPLING DATE, TIME, EXACT LOCATION OOY; PH Temp, FO G	X YES		□ N/A		
(ii) ANALYSES DATES, TIMES OH T	X YES		□ N/A		
(iii) INDIVIDUAL PERFORMING ANALYSIS	EL YES		□ N/A		
(iv) ANALYTICAL METHODS/TECHNIQUES USED	X YES		□ N/A		
(v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)	SL YES	S NO	□ N/A		
(b) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g. continuous monitoring instrumentation,					
calibration and maintenance records).	KQ YES	S 🗆 NO	□ N/A		
	Ø YES		□N/A		
(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.					
(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT			□ N/A		
() QUALITY ASSURANCE RECORDS KEPT.	☐ YES	S □ NO	□ N/A		
(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES (and their compliance status) USING	~		5 1		
PUBLICLY OWNED TREATMENT WORKS.	O YES	NO_	N/A		
SECTION H - Permit Verification					
INSPECTION OBSERVATIONS VERIFY THE PERMIT. THE YES TONO TONA (Further explanation					
DETAILS: property transfer equire additional NPG		<u> </u>			
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.	U YES		□ N/A		
(b) FACILITY IS AS DESCRIBED IN PERMIT.	K YES	NO	□ N/A		
(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.	. D YES	S □ NO	₽ N/A		
(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.	N YES	□ NO	□ N/A		
(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.	X YES	NO	□ N/A		
(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED.	S YES	NO	□ N/A		
lg) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.	D YES	. □ NO	□ N/A		
THE CORRECT NAME AND LOCATION OF RECEIVING WATERS.	TS YES	□ NO	□ N/A		
(i) ALL DISCHARGES ARE PERMITTED.	X YES	. □ NO	□ N/A		
SECTION I - Operation and Maintenance					
	rther expl	anation attached	1		
DETAILS: SOM - MCCW - AUT. VE OUT fall					
(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED.	X YES		□ N/A		
(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☐ YES		□ N/A		
(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPASTATE AS REQUIRED BY PERMIT.	☐ YES	D NO	N/A		
(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED.	☐ YES		18 N/A		
(e) ALL TREATMENT UNITS IN SERVICE.	C YES	□ NO	ØN/A		
(1) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS.	☐ YES	□ NO	□N/A		
(g) QUALIFIED OPERATING STAFF PROVIDED.	12 YES		□ N/A		
(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS.	YES	□ NO	EN/A		
(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.	☐ YES	□ NO	**************************************		
(;) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR					
EQUIPMENT.	YES		□N/A		
(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED.	AL YES		□ N/A		
(I) SPCC PLAN AVAILABLE.	YES	□ NO	12N/A		
(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. (Dates)	U YES		N/A		
(n) ANY BY-PASSING SINCE LAST INSPECTION.	☐ YES		X N/A		
IOLANIA SALIMOTI III ANIDZIB LIBIJANIC CUERLOADE EVESTISMASS	1 ()/50	1 1 410	INTEL / A		

2/15/90 LTV ST	reel C	SL					Approved No. 158 - Ro
					PERMI	T NO.	··
					160	002	593
SECTION J - Compliance Schedules							
PERMITTEE IS MEETING COMPLIANCE SCHEDULE. CHECK APPROPRIATE PHASE(S): (a) THE PERMITTEE HAS OBTAINED THE NECES	☐ YES	□ NO S FROM T	N/A HE APPRO	(Further exp	olanation a	ttached _	
AUTHORITIES TO BEGIN CONSTRUCTION.					ı		
☐ (b) PROPER ARRANGEMENT HAS BEEN MADE F ☐ (c) CONTRACTS FOR ENGINEERING SERVICES	•	0 0	ommument	s, grants, etc.	<i>J.</i>		
(d) DESIGN PLANS AND SPECIFICATIONS HAVE							
(a) Design Plans and Specifications have	BEEN COMPLETEL	٠.					
(f) CONSTRUCTION AND/OR EQUIPMENT ACQU	USITION IS ON SOU	505					
	ISTITION IS ON SCH	EDUCE.					
(g) CONSTRUCTION HAS BEEN COMPLETED.							
(h) START-UP HAS COMMENCED.							
(i) THE PERMITTEE HAS REQUESTED AN EXTE	NSION OF TIME.						
SECTION K - Self-Monitoring Program							
Part 1 - Flow measurement (Further explanation attach	ned						
PERMITTEE FLOW MEASUREMENT MEETS THE REQU	•	ITENT OF	THE PER	MIT.	S YES		0 🗆 N
DETAILS.	0-216/	SUZYC	·				
(a) PRIMARY MEASURING DEVICE PROPERLY INSTAL	LED.				YES	2	0 🛭 N
TYPE OF DEVICE: TWEIR TPARSHALL FE	LUME MAGMET	ren 🗆 v	ENTURI	METER D	OTHER /S	pecify	
(b) CALIBRATION FREQUENCY ADEQUATE. (Date of la	st calibration				☐ YES	□ N	o Din
(c) PRIMARY FLOW MEASURING DEVICE PROPERLY O	PERATED AND MA	INTAINE	D.		☐ YES	O N	
(d)SECONDARY INSTRUMENTS (totalizers, recorders, etc.	PROPERLY OPER	ATED AN	ID MAINT	LINED.	☐ YES	_ N	о М и
(e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO	HANDLE EXPECTE	DRANGE	ESOFFLO	W RATES	☐ YES	_ D N	0 🖾 N/
Part 2 — Sampling (Further explanation attached				_			

YES

X YES

K YES

YES

□ NO

□ мо

ON D

ON D

□ N/A

□ N/A

□ N/A

□ N/A

DETAILS.

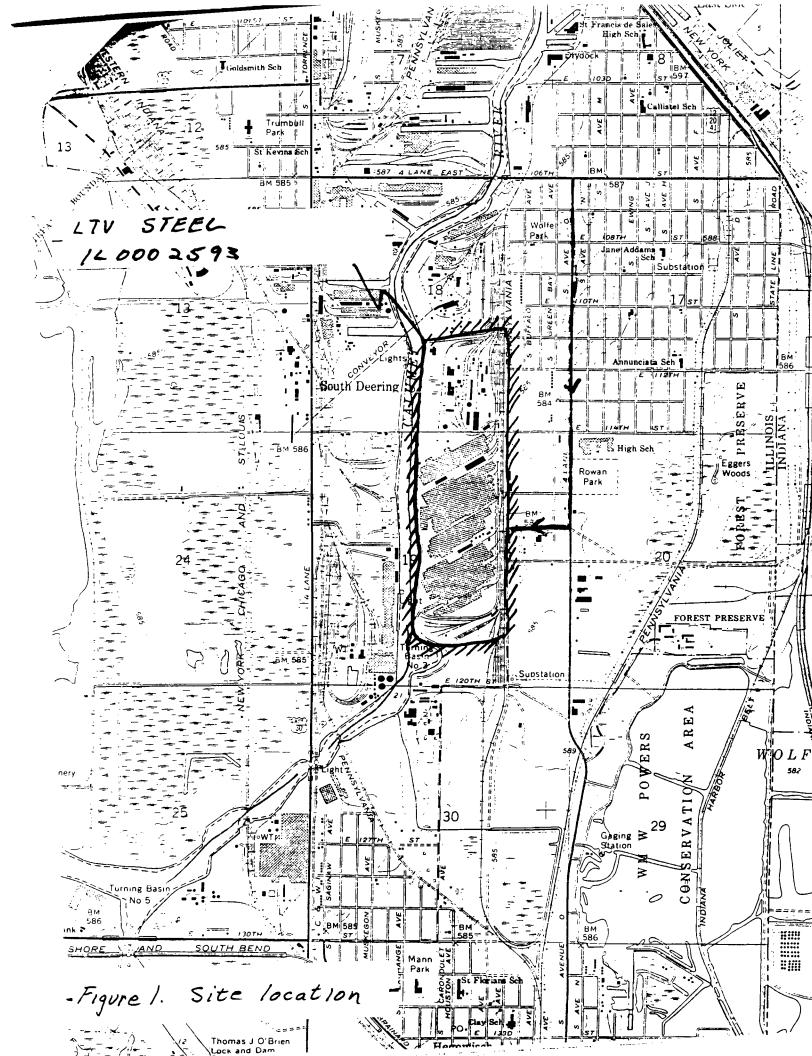
IFNO. GRAB MANUAL COMPOSITE DAUTOMATIC COMPOSITE ON D X YES □N/A (d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE. X YES □ NO □ N/A SAMPLES REFRIGERATED DURING COMPOSITING YES. ON D □ N/A (ii) PROPER PRESERVATION TECHNIQUES USED TYES □ NO BN/A FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT N YES SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3 □ NO □ N/A e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY ☐ YES M NO □ N/A PERMIT. YES f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT. □ NO N/A PLANT COKE -HB Part 3 - Laboratory (Further explanation attached ______) PERMITTEE LABORATORY PROCEDURES MEET THE RECUIREMENTS AND INTENT OF THE PERMIT. □ NO □ N/A (a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. (40 CFR 136.3) CH, T X YES □ NO □ N/A / (b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED. 🗖 YES □ NO R N/A (c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED. TYES M NO □ N/AI YES □ NO d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. □ N/A n H N/A (e) QUALITY CONTROL PROCEDURES USED. 🛛 YES □ ио 141 T YES □ NO (f) DUPLICATE SAMPLES ARE ANALYZED. _ % OF TIME. ANA A ☐ YES □ NO g) SPIKED SAMPLES ARE USED. _____ % OF TIME. N/A (h) COMMERCIAL LABORATORY USED. ☐ YES NO ME □ N/A (i) COMMERCIAL LABORATORY STATE CERTIFIED. YES □ NO **⊠**N/A LAB NAME _ LAB ADDRESS . EPA FORM 3560-3 (9-77) PAGE 3 OF 4

PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.

(c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT.

(a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.

(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.



Den 1 y 1-2/1/ acres 3. REPUBLIC ENCINEERED STORES DEPT SUM METER SUBME TER DE FICE CLOCK HOUSE CITY WATER _**188**- O CITY QUATER 10951 ELEF CITY COMPINED SANITARY & STORY SEVER SA- SANITARY WASTE SEAMLESS TUBE IA-<u>-2A</u> <u>–64</u> 90' COMBINATION INTERCEPTER SEWER ? SANITARY WASTE MELT SHOP LACOON A0I-() ALTERNATE SUPPLY SOUTH OVERFLON -COOL INC O-BAT HOT MALL SCALE PIT 14" MILL DEL ARIF E BY PRODUCTS AREA OF ELFING -AIR CONDITION'S ATOM SCHUBBERS COKE BATTERY 40BID WIRE MILL 34 MILL EHERGE [NE BY PASS DOLING CONTINUOUS COL TOWER 10' MILL RECYCLED WATER RETURN **►**[A]-\$ 32MILL ELECTRIC FURNACES CLARIFIE PLANT 3 to long 36 MILL PLANT HI" MILL SCALE PIT BLAST FURNACE BOILER HOUSE MELT SHOP-44 MILL RFCYCLE QHUŞ QHUŞ SCARFING LEGEND SANITARY LUER -ORE YARD FIRE LINE HARE UP HSD STATIONS ----CITY WATER METERS -2 PUMMILE PIPUMPHOUSE RENTENTION BASIN CITT_WATER_MRIERS SH PIPE LINE IN RIVER OUTFALL DOW IN UP MAKE UP OUT ALL RETER #16440168 - PERSONNEL BUILDING CALUMET RIVER MINE MATER METER #9764768 - DATA CERTER PLANT STANKAL SERVICE WATER FLOW CHAST A. STY WATER MERCE BIATIONS 0 METER #7156636 - STORES BEPARTHENT METER #4084519 - 114TR ST. PORP MOUSE

SAMPLING PERIOD FROM:	January 1489 TO: Becember 1449								7UO3	ITY:	(, ,	L	 		
OUTFALL じの円				1)	りい			(,	4					 	•
FROM DMR's		F (0)	₩	FU) G y / (T e.	~ (°	(5 n ₁ r	,-/ U.S)				_		
MONTH '.		1204	Party	116	Daily	m. Avi	Naily Iylaz	nor	mir.				•		
Jan 1484		3.5	35	Ļ		53	60	7.5						 	
Feb		35	35 35					7.1						 	
April		35	35		2	56 64	65 64	1	8.0					 	,
Muy		35	35	2	4	75			8.7						· .
Jung		35	35°	5	<u>3</u>	8 y.		7.5	<u> </u>				-	 	<u> </u>
Avq		35	35	7	3	27	40	7.8	87						
Scpt D. T		35	35°	<u> </u>			83	7-8						 	
Nov		3.5	35	7	2	<u> ۲</u>	66	7.0	8,3	,				 	
Jan 1989 Feb March April May Tong July And Sept Oct Nov Dec 1989		35	35	2	2	52	66	8.0	8:1					 	
Average		35	35	2.	7_	69	74	7.E	8.2					 	
J		_					,		-					 	
											-			 	

Time Received:

Supervisopenes Dans

Lab Section:____

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : CUUUSSY

SAMPLING POINT DESC. : LTV STEEL

SUBMITTING SOURCE # : HAA U3215 SITE # :

DATE COLLECTED: 900215 TIME COLLECTED: 1106 SAMPLING PROGRAM: M6

COLLECTED BY : 46

DELIVERED SY : AG

CUMMENTS :

FUNDING CODE: WPU6 AGENCY ROUTING: CG UNIT CODE:

SAM ITPE LODE: EFFL SAMPLE PURPOSE CODE: A REPORTING INDICATOR: B

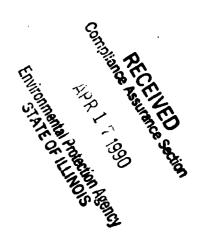
DATE RECEIVED: 900215

DATE RECEIVED: 900215 TIME RECEIVED: 1300 RECEIVED BY: LJP

TRIP 3L SAM# :

SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

PUU4U5 PH-LABORATORY UNITS: 3.5 POOS10 300 5DAY MG/L: 4
PUU550 SOLIOS/TOT.SUS. MG/L: 15 PU0556 OIL/GRAVIMETRIC MG/L: 1



MAR 1 6 1990

Company CECTION - RES